

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JUANA CALZADO,

Plaintiff,

NOTICE FOR REMOVAL

-against-

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK,

Defendants.

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Defendant NATIONAL RAILROAD PASSENGER CORPORATION (“Amtrak”),
through its attorneys, Landman Corsi Ballaine & Ford P.C., respectfully states upon information
and belief:

1. On or about August 3, 2022, Defendant Amtrak received the Summons and
Complaint in this action. A copy of the Summons and Verified Complaint is annexed hereto as
Exhibit A and constitutes all prior pleadings filed in this action.

2. According to the Complaint, on or about July 30, 2019, Plaintiff was a passenger
on a train, allegedly owned by Amtrak, traveling to New York Pennsylvania Station and was
caused to sustain injuries. Plaintiff claims that her injuries were caused by the negligence of
Defendant Amtrak.

3. Defendant Amtrak is removing this action because Defendant Amtrak was created
by an Act of Congress, 49 U.S.C. § 24101, et seq., and more than one-half its capital stock is
owned by the United States. Thus, the above-described action is a civil action of which this Court
has original jurisdiction under the provisions of Title 28, U.S.C. § 1331 and § 1349 and is one

which may be removed to this Court by Amtrak, pursuant to the provisions of Title 28, U.S.C. § 1441.

WHEREFORE, Defendant Amtrak prays that the action now pending against it in the Supreme Court of the State of New York in and for the County of New York be removed therefrom to this Court.

Dated: New York, New York
September 1, 2022

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.

By: /s/ Sophia Ree
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